UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

SCOTT JOHANNESSEN; MERIDIAN VENTURE PARTNERS LLC, a limited liability company,

Plaintiffs,

Case No. 3:13-cv-00296

v.

BAC HOME LOANS SERVICING, LP, a limited partnership; BANK OF AMERICA, N.A., a corporation; and QUALITY LOAN SERVICE CORP., a corporation,

Chief Judge William J. Haynes, Jr.

Defendants.

MOTION FOR TEMPORARY STAY OF FURTHER PROCEEDINGS PENDING NOTIFICATION OF RESULTS OF SETTLEMENT CONFERENCE

Plaintiffs hereby respectfully request that this Court stay all further proceedings in this case pending notification of the results of the court-supervised Settlement Conference held before Magistrate Judge John S. Bryant on October 25, 2013, and in which plaintiffs and defendant Bank of America, N.A. ("BANA"), successor by merger with BAC Home Loans Servicing, L.P., f/k/a Countrywide Home Loans Servicing, L.P., participated (DEs 58).¹

Plaintiffs respectfully submit that good cause exists to temporarily stay further proceedings herein since (1) on December 13, 2013, the Court granted Quality Loan's Motion for Leave to File Reply Brief (DE 60), thus implying that this case is again proceeding without the Court first being notified as to the final results of the Settlement Conference; (2) as a consequence of the Settlement Conference plaintiffs' existing and potential claims against Quality Loan have been procedurally and substantively altered and, thus, will provide plaintiffs good cause to seek leave to file an amended complaint against Quality Loan

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Defendant Quality Loan Service Corporation ("Quality Loan") also participated in the Settlement Conference. However, the claims plaintiffs have asserted against Quality Loan in this case survive and remain extant notwithstanding the results of any settlement discussions by and between plaintiffs and BANA.

as provided under Fed. R. Civ. P. 15(a)(2); and (3) justice requires that leave to amend be freely given under the current procedural and substantive framework of this case.

WHEREFORE, plaintiffs respectfully request that further proceedings in this case be temporarily stayed pending written notification to the Court by plaintiffs and BANA as to the results of the Settlement Conference, which notification is expected in short order.

Respectfully submitted,

By: /s/ Scott D. Johannessen

Scott D. Johannessen, BPR # 26767 LAW OFFICES OF SCOTT D. JOHANNESSEN 3200 West End Avenue, Suite 500

Nashville, TN 37203
Telephone: 877.863.5400
E-Mail: scott@sdjnet.com
Web: www.sdjnet.com

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Local Rule 5.01, the undersigned hereby certifies that on the 17th day of December 2013 she caused a true and correct copy of the following document:

MOTION FOR TEMPORARY STAY OF FURTHER PROCEEDINGS PENDING NOTIFICATION OF RESULTS OF SETTLEMENT CONFERENCE

to be delivered to the following persons/entities appearing of record herein via electronic mail through the Court's ECF system:

H. Frederick Humbracht Bradley Arant Boult Cummings LLP 1600 Division Street, Suite 700 Nashville, TN 37203 Frank R. Olson McCurdy & Candler, LLC Six Piedmont Center, Suite 700 3525 Piedmont Road, N.E. Atlanta, GA 30305

By: /s/Lorrie A. Johannessen

Lorrie A. Johannessen